AUG 29 2001

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED--

Mr. Gordon S. Kuntz, Ph.D.
Senior Environmental Scientist
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-1075

Re: Letter Dated August 17, 2001 from Roy F. Weston
AOC for RI/FS
Index No. II CERCLA-02-99-2035

Dear Mr. Kuntz:

On August 23, 2001, the U.S. Environmental Protection Agency (EPA) received a letter dated August 17, 2001 from your contractor, Roy F. Weston (Weston), proposing a modified sampling approach to achieve the Remedial Investigation/Feasibility Study (RI/FS) objectives.

(1) Soil Sample Grid Spacing for the Route 561 Dump Site & the U.S. Avenue Burn Site

Weston proposes to conduct a geostatistical analysis on the existing data from the Route 561 Dump and the U.S. Avenue Burn Sites to determine an appropriate initial sampling frequency/grid size for the soil sampling requested by EPA past the current fence lines at the Route 561 Dump and the U.S. Avenue Burn Sites and east of Haney Run Brook and White Sand Branch at the U.S. Avenue Burn Site. Further, they propose to complete this analysis in time for inclusion into the revised RI/FS Work Plan.

As noted to you in our July 31, 2001 letter, if the Sherwin-Williams Company (SWC) wishes to use a geostatistical approach for determining sampling grid dimensions past the current fence lines at the Route 561 Dump and the U.S. Avenue Burn Sites and east of Haney Run Brook and White Sand Branch at the U.S. Avenue Burn Site for the RI/FS, SWC must perform the geostatistical analysis for each potential contaminant of concern for each of the Sites and the shortest of the generated grid spacings should be proposed as the grid spacing for the RI/FS sampling at each of the Sites. The percentage of samples to be analyzed for TCL, TAL, and

A:\Addtl follow-up ques- August 2001.wpd

SYMBOL --->	NJP/SCT	NJP/SCT	NJRB					
SURNAME ->	KEVENEY	EVANGELIST	PETERSEN					
DATE --->	8/29/01	8/29/01	8/29/01					

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As noted above under item #1 for the Route 561 Dump and U.S. Avenue Burn Sites, since activities such as backfilling, landscaping, grading, etc. may have covered over/redistributed areas of contamination, the geostatistical analysis must also be conducted for each potential contaminant of concern using subsurface data for the Hilliard's Creek Site, in addition to performing the analysis separately for surface data for each potential contaminant of concern, to be confident that the shortest sampling grid spacing will be proposed for the RI/FS sampling activities. Further, regardless of the sampling grid spacing recommended by the geostatistical analysis, the sampling grid spacing must be adjusted to account for the variances in transportation and depositional characteristics among the contaminants and the topography of the Hilliard's Creek Site. All suspected areas of contamination which may fall outside the proposed sampling grid (such as depositional areas within Hilliard's Creek) must also be specifically proposed for sampling.

Finally the number of soil traverse borehole locations per residential property, the additional sediment samples requested in the vicinity of the culverts, and the number of sample locations per transect noted under comment # 181 in our April 19, 2001 correspondence to you, shall remain the same and must be incorporated into the revised RI/FS Work Plan.

(3) Statistical Significance Test to Limit Sampling for the Analyte List

Weston proposes to use the data from the initial sampling effort "to determine whether sampling for the analyte list can be limited" by conducting a statistical significance test on the data. Weston indicates that SWC requests EPA's approval of this approach prior to incorporating it into the revised RI/FS Work Plan. For purposes of revising the RI/FS Work Plan, the percentage of samples to be analyzed for TCL, TAL, and TCLP parameters for the Sites will be the same as noted in the July 31, 2001 letter to you. EPA may be willing to consider at a later time a proposal to reduce the parameters to be analyzed in subsequent sampling phases as a result of our review of an acceptable level of data generated from the RI/FS sampling activities.